

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



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DPH Environmental Engineering (EE) Program October 30, 2014 Code Advisory Committee (CAC) Meeting

Meeting Sign-in and CAC Member Updates

- CADH, CAWPCAs, CEHA, COWRA, DEEP, HB & RA of CT, Professional Engineer Orgs, Soil Scientists
- Visitor Introductions

EPA Decentralized Wastewater MOU Partnership Agreement & AT National Standard Meeting

- **November 19-20, 2014 EPA Decentralized Wastewater MOU Partnership Meeting:** New 3-year partnership agreement (Decentralized Wastewater Management Memorandum of Understanding (MOU) between the U.S. Environmental Protection Agency (EPA) and Partner Organizations) is to be memorialized at the partnership meeting, and it will include three new organizations: International Association of Plumbing and Mechanical Officials (IAPMO), National Rural Water Association (NRWA), and the National Association of Home Builders (NAHB).
- **Alternative Treatment (AT) System National Standard Meeting:** EPA has contacted state on-site regulators to encourage participation (in person & phone in) in a November 18, 2014 pre-meeting on "The Need for National Standardization in Technology Approval" that mainly concerns AT systems.

Climate Change/Resiliency (CC/R) & Long Island Sound Matters

- **Long Island Sound Study (LISS) Comprehensive Conservation & Management Plan (CCMP) Update:** The September 2014 draft is available at www.longislandsoundstudy.net/Planupdate, and the LISS anticipates having the final revised CCMP completed by January 2015. The Supplemental Document for Implementation Actions (IAs) (See attached pages 5 & 6, and 21 – 24 for IA #s WW-14 through WW-17) that concern on-site sewage systems.
- **URI New England Onsite Wastewater Training Center Climate Change Presentation:** Acknowledge presentation by J. Amador, G. Loomis, J. Cooper, & D. Kalen on "Soil-Based Onsite Wastewater Treatment and the Challenges of Climate Change" as it is useful in highlighting issues CT will need to address moving forward. The presentations was shared with CIRCA, UConn CLEAR Program, and DEEP, along with attached update concerning an August 4, 2014 meeting with UConn CLEAR educator officials.
- **CAWPCA November 14, 2014 Fall Workshop:** Climate Change & Coastal Resilience Topics are on the agenda.
- **The U.S. Department of Housing & Urban Development National Disaster Resilience Competition:** Additional HUD Disaster Recovery funds (approximately 1 billion \$) will be competitively awarded to eligible communities, and the EE Program has reached out to DOH, HUD, and other state agencies to encourage outreach and support for funding opportunities for CT municipalities that rely on decentralized sewage systems.

Nonpoint Source (NPS) Pollution Matters

- **NPS Management Plan:** The updated CT NPS Management Plan (154 page document) was approved by EPA on September 29, 2014, and the plan sets out NPS pollution control strategies for the next 5 years including ones for on-site sewage systems (see attached pages 57 - 62). The plan is available online at: www.ct.gov/deep/nps. Although the DPH is listed as a cooperating state agency in developing the plan, the DPH and EE Program, and decentralized sewage system (DSS) stakeholder organizations were not afforded the opportunity to provide input into the plan update. After a cursory review, the EE Program has identified some minor concerns (inconsistent terminology w/ DPH codes, inaccurate jurisdictional lines, etc...), however the biggest overriding issue with the plan appears to be that it supports limited/targeted DSS management initiatives, and this fragmented approach to DSS management continues to impede progress on broader comprehensive DSS management as supported by EPA. The plan discusses the creation of a State Nonpoint Source Technical Committee, but EE Program participation in the committee and support for the NPS pollution initiatives outlined will be undertaken within available resources.



If you require aid or accommodation to participate fully and fairly in this meeting, please phone (860) 509-7293

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Stormwater Matters:

- **Proposed Revision to the MS4 General Permit:** DEEP has issued a draft of proposed changes to the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (known as the MS4 permit) that is set to expire in January 2015. There was an August 6, 2014 Informational Meeting on the Proposed MS4 Reissuance, and the power point presentation is available on the DEEP web site along w/ draft permit, and fact sheets. Public notice was done on July 7, 2014, and there was a 60 day comment period following the notice, and that period has passed. The CT Conference of Municipalities (CCM) and others provided comments that resulted in the scheduling of a December 17, 2014, 10 a.m. Public Hearing at DEEP on the proposed permit. The current MS4 GP covers 113 municipalities, and the proposed permit will cover all municipalities under a 2-tier approach. The proposed permit includes increased water quality dry & wet weather stormwater monitoring, new public outreach & education (O & E) requirements, and an expansion and implementation of Illicit Discharge Detection & Elimination (IDDE) local ordinances. Matters concerning septic systems are included in the proposed permit and they are part of the O & E, IDDE program requirements, which include sanitary surveys and the identification of system failures. Local IDDE programs will need to be established to septic system failure protocols/requirements for areas w/ waters for which phosphorus, nitrogen, or bacteria is a concern. The local IDDE ordinances/laws will also need to make consistency w/ the 2002 CT E & S Guidelines and the 2004 CT Stormwater Quality Manual a requirement.

Revisions to the *Technical Standards for Subsurface Sewage Disposal Systems* (Technical Standards)

- **Perc-Rite Drip Dispersal:** The state of Vermont recently (6/23/14) issued a General Use approval for the Perc-Rite technology, and several of the Q & A provisions (training & maintenance) included in the approval are being considered for adoption in the Technical Standards.
- **Stormwater Infiltration Comments:** John Pugliesi, PE w/ Edward J. Frattaroli, Inc. provided comments dated October 15, 2014 recommending setback distances between septic systems and stormwater infiltration systems be based on stormwater volume considerations rather than arbitrary drainage areas.
- **Closed Loop Geothermal System Setbacks:** Peter Travino, PE, an individual that is involved with the CT Geothermal Association and who has previously provided recommendations to DPH on this item, has sent a September 25, 2014 email communication in support of the new setback distances.
- **Minimum Leaching System Spread (MLSS) Revisions:** At the last CAC meeting, it was noted that consideration is being given to a revision to the receiving soil (RS) depth measurement in the leaching system area to so that it is measured from the top of the leaching system to the restrictive layer, rather than from the bottom of the leaching system. Further consideration is being given to use this measurement protocol for new system plan approvals. The current NCR MLSS provisions include a requirement about maximum % spread being provided based on a RS depth of 18" – 22", and that provisions can result in non-technically defensible spreads on larger pre-existing lots with limited naturally occurring soil. Revisions to address are being discussed.
- **Effective Leaching Area (ELA) Ratings:** New language being introduced that would apply to new proprietary leaching system approvals issued after January 1, 2015, and it would note ELA credits for competing and internal interfaces would be limited: Competing interfaces (no credit for < ½ inch, 50% credit for ½ to 2 inches), Internal Interfaces less than 4 inches apart (Proprietary company must establish there is sufficient bottom sand area available to transmit partly treated effluent while maintaining soil aeration and low soil moisture content in the sand column). Language being introduced about establishing similar criteria or rating controls for existing approved proprietary leaching systems.
- **Technical Standards' Revisions:** The next revision is anticipated to be published on January 1, 2015. See attached Summary of Proposed January 1, 2015 Revisions to the Technical Standards dated October 30, 2014.